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January 20, 2023

**VIA E-MAIL**

Hon. Analisa Torres  
 United States District Judge  
 Daniel Patrick Moynihan  
 United States Courthouse  
 500 Pearl Street  
 New York, New York 10007

**Re: *Moonbug Entertainment Ltd., et al. v. 640350 Store, et al.***  
**Case No. 22-cv-5042 (AT)**  
**Request For Extension of Time to File Motion for Default Judgment**

Dear Judge Torres,

We represent Plaintiffs Moonbug Entertainment Limited and Treasure Studio Inc. (“Plaintiffs”), in the above-referenced matter (the “Action”).<sup>1</sup> On November 29, 2022, the Court entered an Order directing Plaintiffs to file their Motion for Default Judgment by no later than January 30, 2023. (Dkt. 31). Plaintiffs respectfully request an extension of time, until March 3, 2023 to file their Motion for Default Judgment. In accordance with Your Honor’s Individual Rules of Practice, Plaintiffs respectfully submit the following:

1. **Original Deadline:** January 30, 2023
2. **The number of previous requests for adjournment:** None, this is the first request for an extension of time to file Plaintiffs’ Motion for Default Judgment.
3. **The reason for the current request:** In a similar action, *Spin Master Ltd. v. >TC Toy Store, et al.*, 22-cv-890, Dkt. 34, after plaintiff filed its motion for default judgment, Your Honor entered an Order directing plaintiff to provide additional information supporting personal jurisdiction as to each defendant. In anticipation of the Court requiring the same showing in this Action, Plaintiffs requested the same data from AliExpress herein. After making Plaintiffs’ request, we received an automated out of office message indicating that AliExpress’s office would be closed through January 27, 2023 in observation of the Chinese Lunar New Year. In Epstein Drangel’s experience in requesting similar information from AliExpress, it can take AliExpress upwards of one month to provide such information. Without receiving the requisite information from AliExpress, Plaintiffs will be unable to respond to the Court’s inquiry. Accordingly, Plaintiffs respectfully request an extension of time to allow AliExpress to respond to Plaintiffs so that

<sup>1</sup> Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiff’s Complaint or Application.

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Plaintiffs can establish personal jurisdiction over each Defendant in their Motion for Default Judgment.

4. **Whether the adversary consents:** All of the Defendants remaining in this Action are currently in default, thus Plaintiffs did not seek their consent.
5. **Proposed alternative dates:** Plaintiffs respectfully propose filing their Motion for Default Judgment by no later than March 3, 2023.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

**EPSTEIN DRANGEL LLP**

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*Moonbug Entertainment Limited and Treasure  
Studio Inc.*

GRANTED. By **March 3, 2023**, Plaintiffs shall  
file their motion for default judgment.

SO ORDERED.

Dated: January 24, 2023  
New York, New York



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ANALISA TORRES  
United States District Judge